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10 Attorneys for Defendant
SC MARKETING GROUP, INC.

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 CELLULOSE MATERIAL SOLUTIONS, LLC,)	CASE NO.: 3:22-cv-03141-LB
)	
16 Plaintiff,)	DECLARATION OF
)	CHRISTOPHER D. MAYS IN
17 v.)	SUPPORT OF SC MARKETING
)	GROUP, INC.'S MOTION FOR
18 SC MARKETING GROUP, INC.,)	SUMMARY JUDGMENT OF
)	INVALIDITY
19 Defendant.)	
)	Judge: Hon. Laurel Beeler
)	Date: February 29, 2024
)	Time: 9:30 a.m.
)	Location: San Francisco Courthouse,
)	Courtroom B – 15th Floor

23 I, Christopher D. Mays, declare as follows:

24 1. I am an attorney at law duly licensed to practice in the State of California and
25 before this Court. I am an associate at the firm of Wilson Sonsini Goodrich & Rosati, counsel of
26 record for defendant-counterclaim plaintiff SC Marketing Group, Inc. (dba Thermal Shipping
27 Solutions "TSS"). I have personal knowledge of the facts set forth herein and, if called as a
28

1 witness, could and would testify competently thereto. I submit this declaration in support of the
2 accompanying notice of motion and motion for summary judgment.

3 2. Attached to this declaration as **Exhibit 1** is a true and correct copy of a declaration
4 from TSS's owner, President, and Chief Executive Officer, Salvatore Cardinale.

5 3. Attached to this declaration as **Exhibit 2** is a true and correct copy of a June 19,
6 2015 email from C. Benner to S. Cardinale, bearing bates number CMS0022031.

7 4. Attached to this declaration as **Exhibit 3** is a true and correct copy of excerpts to
8 the Deposition Transcript of Matthew Henderson, taken October 10, 2023. **[FILED UNDER**
9 **SEAL]**.

10 5. Attached to this declaration as **Exhibit 4** is a true and correct copy of excerpts to
11 the Deposition Transcript of Kevin Chase, taken October 11, 2023. **[FILED UNDER SEAL]**.

12 6. Attached to this declaration as **Exhibit 5** is a true and correct copy a purchase order
13 dated February 23, 2016, showing the sale of TSS's PET AB product to Dinner Thyme, bearing
14 bates number TSS_00001791.

15 7. Attached to this declaration as **Exhibit 6** is a true and correct copy of a declaration
16 from TSS's technical expert Dr. Radhakrishnaiah Parachuru and Exhibits A-C in support thereof.

17 8. Attached to this declaration as **Exhibit 7** is a true and correct copy of excerpts to
18 the Deposition Transcript of Paul Turner, taken September 14, 2023.

19 9. Attached to this declaration as **Exhibit 8** is a true and correct copy of Plaintiff's
20 Second Supplemental Disclosure of Asserted Claims and Infringement Contentions.

21 I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing is true and correct. Executed on 16 January 2024 in Palo Alto, California.

23 WILSON SONSINI GOODRICH & ROSATI
24 Professional Corporation

25 By: /s/ Christopher D. Mays

26 Christopher D. Mays

27 Attorneys for Defendant
28 SC MARKETING GROUP, INC.

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EXHIBIT	DESCRIPTION
1.	Declaration of S. Cardinale
2.	6/19/2015 Email from C. Benner to S. Cardinale
3.	[SEALED] 10/10/2023 Matthew Henderson Deposition Transcript
4.	[SEALED] 10/11/2023 Kevin Chase Deposition Transcript
5.	TSS_00001791
6.	Dr. Radhakrishnaiah Parachuru Declaration and Exhibits A-C
7.	9/14/2023 Paul Turner Deposition Transcript
8.	10/26/2022 CMS Second Supplemental Disclosure of Asserted Claims and Infringement Contentions and Exhibits A-I